

**From:** Pease, Anita  
**To:** Anderson, Brian; Hartless, Christine  
**Cc:** Grable, Melissa  
**Subject:** FW: rozol  
**Date:** Monday, September 30, 2013 8:54:28 AM

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FYI...scroll down for concerns we are hearing from Montana Dept. Ag related to misuse of Rozol. Please share w/others in your branch who may be interested.

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Anita Pease  
Associate Director  
Environmental Fate and Effects Division  
Office of Pesticide Programs  
USEPA

703-305-0392  
[pease.anita@epa.gov](mailto:pease.anita@epa.gov)

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**From:** Hebert, John  
**Sent:** Friday, September 27, 2013 4:00 PM  
**To:** Pease, Anita; Grable, Melissa  
**Cc:** Baris, Reuben; Laws, Meredith  
**Subject:** FW: rozol

Email #2....

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**From:** Bamber, Amy [<mailto:abamber@mt.gov>]  
**Sent:** Wednesday, September 18, 2013 5:16 PM  
**To:** Hebert, John  
**Subject:** FW: rozol

This is what I sent to the contractor and the fish and game contact (she is the nongame animal bureau chief – Lauri). This was before I understood the difficulty he is having with the relationship aspect of what he's been seeing...

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**From:** Bamber, Amy  
**Sent:** Tuesday, September 17, 2013 12:50 PM  
**To:** [REDACTED]  
**Cc:** a-Brown, Lauri; Berry, Leonard; Roth, Rande; Sullins, Monty  
**Subject:** RE: rozol

**\*Personal privacy information\***

Hello Craig,

Here is some info you may or may not have seen:

Scrolling through this page you will see several references to rozol pd bait..these are the formal biological opinions on rozol from the USFWS, and comments back from EPA: <http://www.epa.gov/espp/archive-2012.html> Also, note the Kaput-D info....

Here is the federal docket on rozol which includes many comments through the various comment periods from many entities and epa's responses: <http://www.regulations.gov/#!docketDetail;dt=FR%252BPR%252BN%252BO%252BSR;rpp=25;so=ASC;sb=docId;po=0;D=EPA-HQ-OPP-2011-0909>

If you have trouble accessing these sites or documents within, please let me know.

The MDA has been very active through time with this registration, I would say more than any other state...We did not pursue the special local need registration that was in place with our surrounding states, denied the original state registration due to usfws concerns, worked closely with the local and national usfws offices on the concerns, submitted multiple comments to epa on the issues with the use pattern, and are responsible for getting the two reservation prohibitions on the label.

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**I cannot emphasize this strongly enough**--if you have legitimate concerns regarding the use, as you have stated below, you must contact us immediately so that we can investigate. We have the training, the laboratory expertise, the relationship with epa and the registrant, and the state registration authority necessary to manage the product's use. Contacting others to discuss the situation will not result in meaningful action related to issues with the product's use.

--If you encounter broadcast use, or use outside of the seasonal limits on the label, or use on the Crow--its not a bad idea to take some photos, esp. if they have a date stamp. But you really need to call us immediately.

--The USFWS signed off on the federal registration--both EPA and USFWS know that there likely will be secondary poisonings. The TES bulletins are supposed to be protective of the TES species. This does not mean that it is acceptable for there to be secondary poisonings of other wildlife--but we need the documentation. If you are finding non-TES species that appear affected by the product, feel free to document and coordinate the collection of the animals for testing in our lab. I don't know what your specific work position is, or who you work for, or your experience with animal collections, so I would have a government entity who is experienced in that area collect the animals if at all possible, just to keep things more defensible. If it isn't possible for someone else to collect, then please do so and contact us at your first opportunity. The collected animals should be submitted to us asap.

As a member of the prairie dog working group, I am surprised that you have not contacted Monty Sullins, as he has been active in that group for many years, as well as active in the management of this product's use. Regardless, here are the names you need to know:

Rande Roth--Billings field office/inspections and investigations-district 5 contact info on this map: <http://agr.mt.gov/agr/Programs/Pesticides/Enforcement/FieldOffices/>  
Leonard Berry--Enforcement Program Manager, contact info on the bottom of page: <http://agr.mt.gov/agr/Programs/Pesticides/Enforcement/>  
Linda Johns--Vertebrate Pest Program Manager and Monty's supervisor (Monty will be retiring at the end of this year): <http://agr.mt.gov/agr/Programs/Pesticides/VertebratePest/>  
Or me....

I very much appreciate your concern related to the protection of our wildlife in Montana, and hope to hear from you when you encounter any pesticide-related issues in the future.

Sincerely, Amy

Amy Bamber, Chief  
Technical Services Bureau

MT Department of Agriculture  
406-444-3731

-----Original Message-----

From: Johns, Linda  
Sent: Thursday, September 12, 2013 11:48 PM  
To: Bamber, Amy  
Subject: FW: rozol

From: Craig Knowles [REDACTED]  
Sent: Thursday, September 12, 2013 4:47 PM  
To: Johns, Linda  
Cc: Hanauska-Brown, Lauri  
Subject: rozol

**\*Personal privacy information\***

Linda,

I am a member of the Montana prairie dog working group. The working group has concerns about the use of rozol in Montana for control of black-tailed prairie dogs. This toxicant has a high potential to cause secondary poisoning to any animal that might scavenge prairie dogs or other small mammals killed by rozol. If the bait is not placed at least 6 inches inside prairie dog burrows according to label restrictions, it is a hazard for birds and native ungulates (note that a radio-marked pronghorn antelope in Saskatchewan was documented killed by rozol). In 2006, while mapping prairie dog colonies in North Dakota, I documented illegal widespread use of ramik green for prairie dog control. This anticoagulant appeared to significantly impact burrowing owls which were probably scavenging dead mice. In May 2012, while mapping prairie dog colonies in southeastern Montana I documented the illegal use of rozol which was also not being applied according to label restrictions, nor was there any effort to recover and dispose of prairie dog carcasses. During this mapping effort, I recovered a dead golden eagle below a gumbo knob in an area where colonies were treated with rozol. The carcass was too decomposed to document the cause of death. This summer while interviewing tribal wildlife officials I learned that rozol was being used on the Crow Reservation by non-qualified personnel (i.e. children without adult supervision), during a time period outside that specified by the label restrictions. Note that the label restrictions on rozol prohibit its use on the Crow Reservation and limit its use to certified pesticide applicators or people under their direct supervision.

In southeastern Montana, I saw that rozol had been broadcast in some colonies and learned that it was applied by mechanical baiting in other colonies (4-wheelers with hoppers) at speeds up to 15 mph. I would be nearly certain that with mechanical baiting the grain bait is not being inserted 6 inches into the burrow (a bait spot on the mound is the preferred application since it visually marks a burrow as being treated). I also doubt that prairie dog carcasses were collected or disposed of properly. I read on the label restrictions that transect center lines for searching for prairie dog carcasses can be 200 feet apart and can be conducted from a vehicle traveling 4 mph. My experience with searching for dead prairie dogs is that they are actually difficult to observe and that the label restrictions are not adequate. I would like to see the data that determined that this removes 100% of the carcasses. Also carcass searches at every other day intervals still leaves dead prairie dogs on the surface to be scavenged for up to 48 hours. I do considerable survey work for desert tortoises, and the standard survey protocol for tortoises is 30 foot transect center lines walking at less than 2 mph. I think these issues are going to be a common problems with rozol use. Personally, I can't imagine any rancher picking up dead prairie dogs. At best, they might make a quick trip through the prairie dog colony in their pickup and conclude that dead prairie dogs were not present. Even if prairie dog carcasses are removed and disposed of properly, prairie dog colonies have high density small mammal populations and their carcasses will be scavenged. In addition, my experience with poisoning prairie dogs is that badgers and coyotes dig out prairie dog burrows to scavenge dead prairie dogs. The fact that dead raptors and mammalian predators have consistently been found around prairie dog colonies poisoned with rozol in Kansas and Nebraska suggests that my concerns are warranted. In addition, the blatant disregard for label restrictions that I have noted in North Dakota and Montana certainly suggests that rozol label restrictions will not be adhered to.

I would like to know what your agency is doing to assure that label restrictions are being followed for rozol use. Do you have personnel in the field that directly oversee poisoning operations? I also want to see an accounting of how much rozol has been sold in Montana since 1 October 2012 when it became legal to use in our state.

Thank you for your help on this matter.  
Craig Knowles  
[REDACTED]

**\*Personal privacy information\***